

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

WINFIELD DAVID BARTLETT and LILA)	
MAE BARTLETT,)	Civil Action No. 2:15-cv-04289-MBS
)	
Plaintiffs,)	
)	MOTION TO DISMISS WARREN
vs.)	PUMPS, LLC
)	
AIR & LIQUID SYSTEMS)	
CORPORATION, et al.)	
)	
)	
Defendants.)	
_____)	

COME NOW Plaintiffs Winfield David Bartlett and Lila Mae Bartlett, by and through undersigned counsel, and pursuant to Fed. R. Civ. P. 41 move to dismiss Plaintiffs' claims against Warren Pumps, LLC with prejudice, with each party to bear its own fees and costs. Plaintiffs expressly reserve their rights to proceed against all other defendants.

This _____ day of August 2016.

WE SO MOVE:

WE CONSENT:

MOTLEY RICE, LLC

TURNER PADGET GRAHAM & LANEY
P.A.

s/W. Christopher Swett
W. Christopher Swett
Federal Bar No. 11177
28 Bridgeside Blvd.
P.O. Box 650001
Mt. Pleasant, SC 29464

s/Steven W. Ouzts
Steven W. Ouzts
Federal Bar No. 2945
1901 Main Street, 17th Floor (29201)
Post Office Box 1473
Columbia, South Carolina 29202
(803) 254-2200

ATTORNEYS FOR PLAINTIFFS

ATTORNEYS FOR WARREN PUMPS, LLC

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

WINFIELD DAVID BARTLETT and LILA)	
MAE BARTLETT,)	Civil Action No. 2:15-cv-04289-MBS
)	
Plaintiffs,)	
)	CERTIFICATE OF SERVICE
vs.)	
)	
AIR & LIQUID SYSTEMS)	
CORPORATION, et al.)	
)	
)	
Defendants.)	
)	

On August 18, 2016, the foregoing MOTION TO DISMISS WARREN PUMPS, LLC
was served on all counsel of record in the captioned matter by using the CM/ECF system.

MOTLEY RICE, LLC

s/W. Christopher Swett
W. Christopher Swett
Federal Bar No. 11177
28 Bridgeside Blvd.
Mt. Pleasant, SC 29464
Telephone: (843) 216-9000
cswett@motleyrice.com